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January 28, 1993

Alaska Marine Lines 18000 Pacific Highway South #800 Seattle, WA 98188

Attention: Mr. Bob Strong

Alaska Marine Lines Facilities 7100 2nd Avenue 5615 West Marginal Way SW Seattle, Washington D&M Job No.: 21048-006-005

Dear Mr. Strong:

This letter addresses regulatory concerns regarding the above-referenced facilities. Recent submittals to Department of Ecology (Ecology) include summary Dames & Moore reports (listed below) from the 7100 2nd Avenue assessment, and Fourth Quarterly Sampling Event and Annual Monitoring Report and Soil Excavation report for the 5615 West Marginal Way site completed in November, 1992. Mr. John Stormon, Ecology representative, reviewed the provided information for the 7100 site and responded in a letter dated January 8, 1993. Mr. Stormon during a telephone conversation on October 30, 1992 commented on the site status regarding the 5615 site.

7100 2nd Avenue

Please find enclosed the response from Mr. Stormon regarding subsurface investigations conducted at the 7100 site. Mr. Stormon reviewed the following reports:

- Tank Tightness Tests conducted by B & C Equipment Company, April, 1990;
- Soil Vapor Survey conducted by Dames & Moore, September, 1990;
- Soil and Ground-Water Assessment conducted by Dames & Moore, March, 1991;

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- UST Site Assessment conducted by Dames & Moore, March, 1991; and,
- Fourth Quarterly Sampling Event and Annual Monitoring Report conducted by Dames & Moore, November, 1992.

As a result of our submittal of documents, Mr. Stormon responded that continued ground-water monitoring would be necessary to document that contaminant migration was not occurring. Mr. Stormon also requested that we include one additional analyte (heavy hydrocarbon by method 418.1) to our list of sample parameters. The additional cost to our original proposal for Semi-Annual Ground-Water Monitoring at the 7100 site is \$65 per sample or \$455.

Given that Ecology's main concern is potential off-site migration of contaminated groundwater including potential contaminant migration into the Duwamish Waterway, review of semi-annual ground-water monitoring results will include an assessment of contaminant migration. If contaminants continue to increase in concentration in wells closest to the Duwamish Waterway, it will be necessary to reevaluate the need to remediate either site soils and/or groundwater.

5615 West Marginal Way SW

During a telephone conversation on October 30, 1992, Mr. Stormon commented that his main concern was removal of contaminated soil surrounding the former USTs at the 5615 site. I informed him that Alaska Marine Lines would excavate contaminated soil in November, 1992. Mr. Stormon agreed with our approach to continue groundwater monitoring after the soils were excavated. However, he indicated that if contaminants appeared to be migrating offsite, additional site remediation might be appropriate action. A copy of the Soil Excavation report has been submitted to Ecology to Mr. Stormon's attention.

Potential off-site migration at the 5615 site will be addressed after each ground-water monitoring event. We will assess potential remediation options of site groundwater if off-site contaminant migration appears to be occurring.

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Thank you for your attention to these important issues. We await your response to our submittal of the proposal for ground-water monitoring services at the above-referenced facilities.

Sincerely,

DAMES & MOORE, INC.

myid n. William.

Ingrid M. Williams
Staff Hydrogeologist

Attachment

Letter - Mr. John Stormon

Department of Ecology

cc: Mr. Bill Troy: Alaska Marine Lines